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**Admitted Pro Hac Vice
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANGELA WILLIAMS; JANE DOE #1; JANE
DOE #2,

Plaintiffs,

v.

STEVE SISOLAK, Governor of Nevada, in his
official capacity; AARON FORD, Attorney
General of Nevada, in his official capacity;
THE CITY OF LAS VEGAS; CLARK
COUNTY; NYE COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
WESTERN BEST LLC; JAMA RASHID;
MALLY MALL MUSIC, LLC; FUTURE
MUSIC, LLC; PF SOCIAL MEDIA
MANAGEMENT, LLC; E.P. SANCTUARY;
BLU MAGIC MUSIC, LLC; EXCLUSIVE
BEAUTY LOUNGE, LLC; FIRST
INVESTMENT PROPERTY, LLC; V.I.P.
ENTERTAINMENT, LLC; MP3
PRODUCTIONS, INC.; MMM
PRODUCTIONS, INC.;

CASE NO.: 2:21-cv-01676

**STIPULATION AND [REDACTED],
ORDER FOR EXTENSION OF TIME TO
ANSWER DEFENDANT'S MOTION TO
DISMISS [DOCKET #98] AND WESTERN
DEFENDANT'S PRESERVATION OF
RIGHT TO OPPOSE PLAINTIFFS'
MOTIONS FOR PROTECTIVE ORDERS
[DOCKET #2 AND DOCKET #50]**

[FIRST REQUEST]

SHAC, LLC D/B/A SAPPHIRE
GENTLEMAN'S CLUB AND/OR
SAPPHIRE; SHAC MT, LLC; and LAS
VEGAS BISTRO, LLC D/B/A LARRY
FLYNT'S HUSTLER CLUB,

Defendants.

COMES NOW Plaintiffs, Angela Williams, Jane Doe #1, and Jane Doe #2, by and through their counsel of record, HUTCHISON & STEFFEN, PLLC, and Defendants, Western Best, Inc d/b/a Chicken Ranch and Western Best, LLC ("Defendants"), by and through their counsel of record, the law firm of FOX ROTHSCHILD LLP, hereby stipulate and agree to the following regarding Defendants' Motion to Dismiss filed on December 23, 2021 [Docket #98]:

1. This is the first stipulation for extension of time to file a response to Defendants' Motion to Dismiss [Docket #98];
2. Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have a two-week extension to file and opposition to Defendants' Motion to Dismiss [Docket # 98], extending their deadline to respond to January 20, 2022; and
3. The reason for the extension is Pursuant to Local Rules, Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 have "fourteen days after service of the response" to file their reply. See LR 7-2(b). Fourteen days after the service of the response is Thursday, January 6, 2022. Counsel for Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2 took an extended holiday from December 24, 2021, until January 4, 2022, to visit friends and family out of state in conjunction with the Christmas and New Year's holidays. Additionally, now legal counsel for Plaintiffs has not contracted COVID. Accordingly, it is agreed that the above extension is agreed upon with good cause.
4. Defendants preserve the right to respond to Plaintiffs' Motions for Protective Orders [Docket #2 and Docket #50], but will not be required to do so until the Court rules on all the currently pending dispositive motions. Plaintiffs will not seek a ruling on their respective Motions for Protective Orders until Defendants are permitted a reasonable

1 period of time to oppose the same.

2 **IT IS SO STIPULATED.**

3 DATED this 5th day of January, 2022.

DATED this 5^h day of January, 2022.

4 **FOX ROTHSCHILD LLP**

HUTCHINSON & STEFFEN, PLLC

5 */s/ Deanna L. Forbush*

/s/ Jason D. Guinasso

6
7 Deanna L. Forbush
Nevada Bar No. 6646
8 Rex D. Garner
Nevada Bar No. 9401
9 John M. Orr
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Attorney for Plaintiffs

14 *Attorneys for Defendants Western Best, LLC*
15 *and Western Best Inc. d/b/a Chicken Ranch*

ORDER

IT IS HEREBY ORDERED that Plaintiffs, Angela Williams; Jane Doe #1; and Jane Doe #2 have an extension of time for Plaintiffs to file their Response to Defendants' Motion to Dismiss [Docket # 98] to **January 20, 2022.**

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IT IS SO ORDERED this 10th day of January, 2022.



DISTRICT COURT JUDGE

Respectfully Submitted by:
HUTCHISON & STEFFEN, PLLC

By: /s/ Jason D. Guinasso
Jason D. Guinasso
Nevada Bar No. 8478
HUTCHISON & STEFFEN, PLLC
5371 Kietzke Lane
Reno, NV 89511
Attorney Plaintiffs

ELECTRONIC CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022, I electronically filed a true and correct copy of the **STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER DEFENDANT’S MOTION TO DISMISS [DOCKET #98] AND WESTERN DEFENDANT’S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS’ MOTIONS FOR PROTECTIVE ORDERS** which was electronically filed with the United States District Court. Electronic service of the foregoing document shall be made in accordance with the Master Service List as follows:

Defendant

Steve Sisolak
Governor of Nevada

represented by **Gregory Louis Zunino**
Nevada State Attorney General’s Office 100
N Carson Street Carson City, NV 89701
775-684-1137
Fax: 775-684-1108
Email: GZunino@ag.nv.gov,
sgeyer@ag.nv.gov

Defendant

Aaron Ford
Attorney General of Nevada

represented by **Gregory Louis Zunino**
(See above for address)

Defendant

The City of Las Vegas

represented by **Jeffrey L Galliher**
Las Vegas City Attorney’s Office
495 S Main Street, 6th Flr
Las Vegas, NV 89101
702-229-6629
Fax: 702-386-1749
Email: jgalliher@lasvegasnevada.gov,
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Defendant
Clark County

represented by **Joel K Browning**
Clark County District Attorney Civil Division
500 S. Grand Central Pkwy, #5075
Las Vegas, NV 89155-2215
702-455-4761
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Defendant
Nye County

represented by **Brent L Ryman Erickson**
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775-786-3930
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daguirre@etsreno.com, lligouri@etsreno.com

Defendant
Las Vegas Bistro, LLC D/B/A
Larry Flynt's Hustler Club

represented by **Zachary Youngsma**
c/o Deanna L. Forbush
Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
Email: dforbush@foxrothschild.com;
zach@bradshaferlaw.com

Defendant
Western Best Inc. D/B/A
Chicken Ranch

represented by **Deanna L. Forbush**
Fox Rothschild LLP
198 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
702-262-6899
Fax: 702-597-5503
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1 **Defendant**

2 Western Best LLC

3 represented by **Deanna L. Forbush**

4 Fox Rothschild LLP

5 198 Festival Plaza Drive, Suite 700

6 Las Vegas, Nevada 89135

7 702-262-6899

8 Fax: 702-597-5503

9 Email: dforbush@foxrothschild.com

10 **Defendant**

11 SHAC, LLC d/b/a Sapphire

12 Gentlemen's Club and/or Sapphire

13 Represented by:

14 Lewis Roca Rothgerber Christie LLP

15 Hughes Center

16 3993 Howard Hughes Parkway

17 Suite 600

18 Las Vegas, NV 89169-5996

19 702.474.2622

20 702.949.8298 (fax)

21 E-mail: OBrown@lrrc.com

22 **Defendant**

23 SHAC, MT, LLC

24 Represented by:

25 Lewis Roca Rothgerber Christie LLP

26 Hughes Center

27 3993 Howard Hughes Parkway

28 Suite 600

Las Vegas, NV 89169-5996

702.474.2622

702.949.8298 (fax)

E-mail: OBrown@lrrc.com

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that on this 5th day of January, 2022,
**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO ANSWER
DEFENDANT'S MOTION TO DISMISS [DOCKET #98] AND WESTERN
DEFENDANT'S PRESERVATION OF RIGHT TO OPPOSE PLAINTIFFS' MOTIONS
FOR PROTECTIVE ORDERS** was electronically filed with the United States District Court. I
caused service via US Mail upon the following:

Defendant

Jamal Rashid
Federal Correction Institution
Sheridan at 27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Mally Mall Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

E.P. Sanctuary
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Blu Magic Music, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

Exclusive Beauty Lounge, LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

First Investment Property LLC
Attn: Jamal Rashid
Federal Correction Institution Sheridan
27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

Defendant

V.I.P Entertainment, LLC
Attn: Jazz A.
2764 N Green Valley Pkwy #400
Henderson, NV, 89014

Defendant

MP3 Productions, INC.,
c/o Registered Agent: Nevada Corporate Headquarters, Inc.
4730 S Fort Apache Rd, Suite 300,
Las Vegas, NV, 89147

Defendant

MMM Productions, INC,
Attn: Jamal Rashid
Federal Correction Instutuion
Sheridan at 27072 SW Ballston Rd.
Sheridan, OR 97378
(Inmate #45040-509)

DATED this 5th day of January, 2022

BY: /s/Melissa Lilley

An Employee of Hutchison & Steffen, PLLC